



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 24, 2022

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BY ECF

Hon. Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Leuris Sabala-Mejia, 21 Cr. 225 (MKV)

Dear Judge Vyskocil:

The Government writes, pursuant to the Court's Individual Rule 1.G, to request an additional two-week adjournment of its deadline to file its opposition to defendant Sabala-Mejia's pending motion to suppress. *See* Dkt. No. 105. This is the Government's second request for an extension. The Government's original deadline to respond was May 12, 2022, which the Court adjourned to May 24, 2022 at the Government's request. *See* Dkt. No. 112. The parties are continuing in their discussions regarding a pretrial disposition that would moot the defendant's motion but need additional time to complete those discussions. Accordingly, the Government respectfully requests a two-week adjournment, to June 10, 2022, for filing its opposition brief to the defendant's motion. The defendant consents to this adjournment.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Matthew R. Shahabian
Assistant United States Attorney
(212) 637-1046

cc: Susan Marcus, Esq. (by ECF)

This request is DENIED IN PART as untimely. In an Order dated May 13, 2022, the Court warned that it would "deny any future request by the prosecutor for an extension or adjournment made less than 72 hours prior to the scheduled deadline without a showing of good cause for such an untimely request" [ECF No. 112]. This request for a further extension was filed at 4:41 p.m. the day of the deadline, and the prosecutor failed even to acknowledge the Court's previous warning. The prosecutor cannot continue to ignore the Court's Individual Rules and orders without consequences. Any opposition must be filed by 5:00 p.m. on May 26, 2022.

Date: May 24, 2022
New York, New York

Mary Kay Vyskocil
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United States District Judge